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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

| Case No. 2:25-mj-00114

Plaintiff,

V.

VICTOR JESUS APODACA-GOMEZ,

Stipulation for an Order Directing Probation to Prepare a Criminal History Report

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and between Sue Fahami, Acting United States Attorney, and Clay Plummer, Special Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Joy Chen, Assistant Federal Public Defender, counsel for defendant VICTOR JESUS APODACA-GOMEZ, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

23 1. The United States Attorney's Office has developed an early disposition
24 program for immigration cases, authorized by the Attorney General pursuant to the

1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
2 extended to the defendant a plea offer in which the parties would agree to jointly request an
3 expedited sentencing immediately after the defendant enters a guilty plea.

4 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
5 history until after the defendant enters his guilty plea unless the Court enters an order
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
7 a defendant's initial appearance when charged by indictment.

8 3. The U.S. Probation Office informs the government that it would like to begin
9 obtaining the criminal history of defendants eligible for the early disposition program as
10 soon as possible after their initial appearance so that the Probation Office can complete the
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12 4. Accordingly, the parties request that the Court enter an order directing the
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14 DATED this 24th day of February, 2025.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

SUE FAHAMI
Acting United States Attorney

18 /s/ *Joy Chen*
19 Assistant Federal Public Defender
20 Counsel for Defendant
 VICTOR JESUS APODACA-GOMEZ

/s/ Clay Plummer
CLAY A PLUMMER
Special Assistant United States Attorneys

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 VICTOR JESUS APODACA-GOMEZ,

7 Defendant.

8 Case No. 2:25-mj-00114

9
10 **Order Directing Probation to
11 Prepare a Criminal History
12 Report [Proposed]**

13 Based on the stipulation of counsel, good cause appearing, and the best interest of
14 justice being served:

15 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
16 report detailing the defendant's criminal history.

17 DATED this 25 day of February, 2025.

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25 HONORABLE BRENDA J. WEKSLER
26 UNITED STATES MAGISTRATE JUDGE